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12 AMERIPRISE FINANCIAL, INC.

13
14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 DANIELLE O'NEILL, individually,
17 Plaintiff,

Case No. 2:19-cv-02233-JAD-EJY

18 vs.
19 AMERIPRISE FINANCIAL, INC., a
20 Delaware Corporation, a Delaware
21 Corporation,

**~~PROPOSED~~ STIPULATION AND ORDER
TO CONTINUE DEADLINE RE FILING
RESPONSIVE PLEADING TO AMENDED
COMPLAINT (ECF No. 12)**

22 Defendant.

23 Plaintiff DANIELLE O'NEILL ("Plaintiff") and Defendant AMERIPRISE FINANCIAL,
24 INC. ("Defendant"), by and through their respective counsel of record, hereby stipulate and
25 agree that Defendant shall have one (1) additional week to file its responsive pleading to
26 Plaintiff's First Amended Complaint (ECF No. 12), which Amended Complaint was filed and
27 served on March 25, 2020 (ECF No. 12). The parties make this request due to scheduling
28 conflicts and need for additional time to investigate the allegations in the Amended Complaint in
order to respond.

29 Defendant filed a Motion for Partial Dismissal of Plaintiff's Complaint (ECF No. 10).
30 Plaintiff filed an Amended Complaint on March 25, 2020 (ECF No. 12). The Motion for Partial
31 Dismissal was denied as moot by the Court on March 27, 2020 (ECF No. 14).

If the requested extension is granted, Defendant will file its response to Plaintiff's Complaint on **April 15, 2020**.

This is the first request for an extension of time to file a responsive pleading to Plaintiff's Amended Complaint made by the parties and the parties make this request in good faith and not for the purpose of delay.

Dated: March 30, 2020

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Respectfully submitted,

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/s/ Andre M. Lagomarsino, Esq.
ANDRE M. LAGOMARSINO, ESQ.
LAGOMARSINO LAW

MONTGOMERY PAEK, ESQ.
Z. KATHRYN BRANSON, ESQ.
LITTLER MENDELSON, P.C.

Attorney for Plaintiff

Attorneys for Defendants

ORDER

IT IS SO ORDERED.

Dated: March 31, 2020.

4843-7827-3976.1 057419.1006

UNITED STATES MAGISTRATE JUDGE

UNITED STATES MAGISTRATE JUDGE